

RUSSIA-RELATED SANCTIONS

A Plain-Language Guide for Compliance Professionals

What the law does, who it affects, and what to check before a transaction

Field	Value
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1. What Are Russia-Related Sanctions, and Why Do They Matter?

Russia-related sanctions are legal restrictions imposed by the United States government that limit or prohibit certain financial transactions, trade, and investments involving Russia and Russian-connected parties. They are administered by the U.S. Treasury Department's Office of Foreign Assets Control — known as [OFAC](#).

These sanctions were not created all at once. They accumulated in layers starting in 2012, with a major expansion in 2014 (following Russia's annexation of Crimea), another round in 2017 (with CAATSA), and massive expansion in 2021–2022 (following Russia's full-scale invasion of Ukraine).

WHY THIS MATTERS TO YOU

Even if your organization does not do direct business with Russia, you may be affected by Russia sanctions if: (a) a transaction involves a Russian-owned or Russian-connected company, even in a third country; (b) a payment passes through a blocked financial institution; (c) you are providing services that fall under categorical prohibitions; or (d) a business partner has Russia-related exposure that could put you at risk.

1.1 The Four Programs at a Glance

There are four separate OFAC programs covering Russia-related sanctions. Each has a different focus:

Program	What It Does in Plain Language	Who It Affects Most
Russian Harmful Foreign Activities Sanctions (E.O. 14024)	The broadest program — blocks specific individuals and companies, bans many imports and services to Russia, and can reach non-U.S. banks that help Russia	Anyone dealing with Russia-connected companies, financial institutions, or Russian-origin goods
Ukraine-/Russia-Related Sanctions (E.O. 13660–13685)	Created in 2014 — blocks people who undermined Ukraine's sovereignty and restricts business with key Russian economic sectors (energy, finance, defense)	Banks, investors, energy companies dealing with Russian sector entities on the SSI List
CAATSA Title II — Russia (P.L. 115-44)	A 2017 law that locked existing sanctions into statute and added new penalties for anyone — including non-U.S. companies — doing significant business with Russia's defense or intelligence sectors	Non-U.S. companies considering defense procurement from Russia; anyone doing significant business with sanctioned Russian parties
Magnitsky Sanctions (P.L. 112-208)	Targets specific individuals responsible for Russian human rights abuses or the death of Sergei Magnitsky — a tax lawyer who died in Russian custody in 2009	Anyone with direct dealings with designated Russian officials or human rights abusers

KEY TAKEAWAY

Russia sanctions are not a single law — they are four overlapping programs built up over 12 years. A transaction can be fine under one program and prohibited under another. Always check all applicable programs.

2. Essential Concepts — What the Terms Mean

Before diving into what each program prohibits, here are the key terms you need to know:

Blocking / Asset Freeze

When OFAC "blocks" someone, it means all of their property and money that is within reach of the U.S. financial system is frozen. U.S. banks must hold it; U.S. companies cannot do business with that person. The blocked party cannot access their assets until sanctions are lifted or they get special permission from OFAC.

The SDN List (Specially Designated Nationals List)

The [SDN List](#) is OFAC's main list of blocked parties — individuals, companies, ships, and other entities that U.S. persons are generally prohibited from dealing with. If someone is on the SDN List, their assets in the U.S. are frozen and almost all transactions with them are prohibited. The Russia-related SDN tags include [UKRAINE-EO13660], [UKRAINE-EO13661], [UKRAINE-EO13685], [RUSSIA-EO14024], and [MAGNIT].

The SSI List (Sectoral Sanctions Identifications List)

The SSI List is different from the SDN List. Entities on the SSI List are not fully blocked — you can still do business with them in most ways. But specific types of transactions are restricted: mainly, issuing new loans above certain time limits, buying new shares, or providing certain goods, services, or technology. The SSI List applies to Russia's energy, financial, and defense sectors.

The NS-MBS List (Non-SDN Menu-Based Sanctions List)

Entities on the NS-MBS List are subject to targeted restrictions based on which specific "Directive" (rule) they fall under — for example, a prohibition on processing their payments through U.S. banks, or a ban on transactions with Russia's Central Bank. They are not fully blocked, but specific transaction types are prohibited.

The 50% Rule

This is one of the most important — and frequently misunderstood — rules in sanctions compliance. If a blocked or restricted person owns 50% or more of a company (by themselves, or together with other blocked persons), that company is **automatically treated as blocked or restricted** — even if OFAC has never specifically listed the company by name.

Example: If a company is 30% owned by Blocked Person A and 25% owned by Blocked Person B, the combined ownership is 55%, so the company is blocked even though neither owner alone reaches 50%.

Secondary Sanctions

Secondary sanctions are restrictions that apply to **non-U.S. persons** — foreign banks and companies — even if they have no U.S. connection. If a foreign bank does significant business with a sanctioned Russian entity, OFAC can impose sanctions on that bank: cutting it off from the U.S. financial system, blocking its U.S. assets, or imposing other penalties. Russia's secondary sanctions are among the most aggressive OFAC has deployed.

General License

A general license is a published permission from OFAC that allows everyone to do a specific activity that would otherwise be prohibited — without having to ask OFAC individually. For example, there are general licenses allowing payments for agricultural goods, medicines, and journalism activities in Russia. Always check the exact text of a general license — the scope is often narrower than the title suggests.

Specific License

A specific license is an individual permission from OFAC granted to a particular person for a particular transaction. Unlike a general license, you must apply for it and wait for OFAC's approval. OFAC does not have to approve it.

U.S. Person

A "U.S. person" means any U.S. citizen or permanent resident, any entity organized under U.S. law (including foreign branches of U.S. companies), and any person in the United States. Primary sanctions apply to U.S. persons. Non-U.S. persons can face secondary sanctions for certain conduct.

KEY TAKEAWAY

The most common compliance mistakes come from not understanding the 50% Rule (missing unlisted subsidiaries of blocked persons) and not checking the SSI List (assuming that only SDN-listed parties require screening).

3. The Broadest Program: Russian Harmful Foreign Activities Sanctions

This program — based on Executive Order 14024, signed by President Biden in April 2021 — is the largest and most actively updated Russia sanctions program. Think of it as a comprehensive toolkit: it can block specific people and companies, restrict entire sectors of the Russian economy, ban categories of Russian imports, prohibit specific services to Russia, and expose foreign banks to U.S. sanctions if they help sanctioned parties.

It is governed by [31 CFR Part 587](#).

3.1 Who Can Be Blocked (and Why)

OFAC can add a person or company to the SDN List under this program if they:

- Work in a key Russian economic sector — including defense, energy, technology, aerospace, metals and mining, transportation, construction, financial services, or others that OFAC

designates. This means a company can be added to the SDN List simply because of what industry it operates in, not because it did something specific.

- Provided support to a sanctioned party — even if the support was not financial. Technical help, equipment, staffing, and other assistance count.
- Are owned or controlled by a sanctioned party — see the 50% Rule above.
- Tried to evade sanctions — using complex corporate structures, third-country intermediaries, or deceptive documentation.

REAL-WORLD EXAMPLE: SECTOR-BASED DESIGNATION

In January 2025, OFAC issued a Determination that made the "energy sector of the Russian Federation economy" an active designation basis. That same day, OFAC designated Gazprom Neft and Surgutneftegas — two of Russia's largest oil companies — along with hundreds of related vessels, companies, and individuals. Anyone who had an existing contract with these companies suddenly had a blocked-party problem overnight.

3.2 The Four Directives: Rules for Russian Banks and Government Entities

Even if a Russian entity is not on the SDN List, it may be on the NS-MBS List under one of four "Directives" that create specific transaction restrictions:

- **Directive 1A — Sovereign Debt:** U.S. persons cannot buy new bonds or other debt issued by Russia's Central Bank, National Wealth Fund, or Finance Ministry after February 1, 2022.
- **Directive 2 — Russian Bank Correspondent Accounts:** U.S. banks cannot maintain correspondent banking relationships with major Russian banks (including Gazprombank, VTB, and Sberbank). This effectively cuts those banks off from the U.S. dollar payment system.
- **Directive 3 — New Debt and Equity:** U.S. persons cannot provide new loans (over 14 days) or invest in new shares issued by specified Russian financial entities.
- **Directive 4 — Russia's Central Bank, National Wealth Fund, and Finance Ministry:** This is the most sweeping of the four. U.S. persons are prohibited from any transaction involving these three institutions — not just financial transactions, but **any** transaction. A payment that merely passes through Russia's Central Bank is prohibited. See [FAQ #1118](#).

DIRECTIVE 4: "ANY TRANSACTION" MEANS ANY TRANSACTION

Many people assume Directive 4 only applies to wire transfers or financial payments. It does not. OFAC has confirmed that the prohibition on transactions involving Russia's Central Bank, National Wealth Fund, and Finance Ministry is comprehensive. If a payment route, settlement process, or any other transaction touches one of these three institutions, it is prohibited — even if only incidentally. ([FAQ #1118](#))

3.3 What You Cannot Import from Russia

Separate from the SDN and NS-MBS Lists, the U.S. has imposed categorical bans on importing certain Russian goods. These bans apply regardless of who you are buying from — even if the seller is not on any sanctions list:

- Crude oil and petroleum products (December 2022 — with price cap exceptions, see below)
- Gold of Russian origin (June 2022)
- Fish, seafood, and preparations (December 2023)

- Diamond jewelry and unsorted diamonds (March 2024, with value thresholds)
- Aluminum, copper, and nickel of Russian origin (April 2024)
- Russian-origin energy (crude oil, natural gas, coal) — March 2022

3.4 What Services You Cannot Provide to Russia

OFAC has also prohibited U.S. persons from providing certain categories of services to Russia, by publishing official "Determinations" that activate prohibitions under [E.O. 14071](#). These service prohibitions are, like the import bans, categorical — they apply regardless of who the customer is:

- Accounting, trust and corporate formation, and management consulting services (May 2022)
- Architecture and engineering services (June 2023)
- Quantum computing services (September 2022)
- Information technology and software services (effective September 2024)
- Petroleum services — including oil field services, technical assistance, and management services related to oil or gas production in Russia (effective February 27, 2025)

THE PETROLEUM SERVICES BAN: WHAT CHANGED IN FEBRUARY 2025

As of February 27, 2025, U.S. companies are generally prohibited from providing any services related to petroleum production in Russia. This is a significant expansion — it applies not just to Russian companies, but to any oil or gas production occurring in Russia. If your company provides oil field technology, engineering support, or management services to any operator working in Russia (even a non-Russian operator), you likely need to reassess that relationship.

3.5 The Oil Price Cap: An Exception to the Import Ban

The U.S. and G7 partners created a special exception to allow Russian crude oil to continue flowing to global markets — but only if sold at or below a price cap:

- Crude oil cap: \$60 per barrel (December 2022)
- Premium petroleum products (e.g., diesel): \$100 per barrel (February 2023)
- Discount petroleum products (e.g., fuel oil): \$45 per barrel (February 2023)

Under this exception, U.S. shipping companies, insurers, and financial institutions can provide services for Russian crude oil **only if** the oil was sold at or below the cap price. Service providers must obtain price attestations from their customers confirming compliance. See OFAC's [Price Cap Guidance](#).

3.6 Secondary Sanctions: How Foreign Banks Can Get Caught

One of the most powerful tools in the E.O. 14024 program is the ability to sanction **non-U.S. banks and companies** that help blocked Russian parties — even if those foreign entities have no U.S. business.

Under Sections 11 and 12 of E.O. 14024, OFAC can add a foreign bank to the SDN List if it: "significantly" transacts with a company linked to Russia's military-industrial complex, or provides financial services that support sanctioned Russian entities.

What makes this tricky: there is no specific dollar amount that defines "significant." OFAC looks at the full picture — how much, how often, and what the purpose was.

REAL-WORLD EXAMPLE: FOREIGN BANK DESIGNATIONS

Since 2022, OFAC has designated dozens of banks in the UAE, Turkey, China, and Central Asian countries under these secondary sanctions authorities for facilitating Russia-related transactions. The [June 2024 OFAC Advisory](#) specifically warned foreign financial institutions that processing payments that support Russia's military-industrial base — even without direct SDN nexus — creates designation risk.

KEY TAKEAWAY

The Russian Harmful Foreign Activities program is the most comprehensive Russia sanctions tool. It combines SDN blocking, sector-based restrictions, categorical import and services prohibitions, and secondary sanctions that can reach foreign banks with no direct U.S. connection.

4. The 2014 Foundation: Ukraine-/Russia-Related Sanctions

When Russia annexed Crimea in 2014, the U.S. government responded with a new package of sanctions — the first major Russia-specific sanctions since the Cold War. These sanctions are still fully in force today and form the legal foundation for much of what followed.

The program is governed by [31 CFR Part 589](#).

4.1 Why There Are Two Types of Sanctions in This Program

The 2014 sanctions created a system with two very different mechanisms:

- **Full blocking sanctions (SDN List):** For individuals and companies who actively contributed to the situation in Ukraine — Russian oligarchs, officials, arms dealers. Their assets are frozen, and U.S. persons cannot deal with them.
- **Sectoral sanctions (SSI List):** For large Russian companies in key economic sectors. These companies are not fully blocked — you can still do most types of business with them. But specific transaction types are restricted, primarily around providing new financing or investing in new shares.

This two-track approach was new in 2014. The idea was to pressure Russia's economy without triggering a complete cutoff that could destabilize global markets.

4.2 The Sectoral Sanctions and the SSI List: What Is Actually Restricted

If a company appears on the SSI List, check which "Directive" it falls under — each Directive restricts different things:

Directive	Sector	What U.S. Persons Cannot Do
Directive 1	Financial Services (banks)	Cannot provide new loans lasting more than 14 days, or buy new shares
Directive 2	Energy companies	Cannot provide new loans lasting more than 60 days, or buy new shares
Directive 3	Defense sector	Cannot provide new loans over 30 days; also cannot provide goods, services, or technology for

Directive	Sector	What U.S. Persons Cannot Do
		deepwater/Arctic/shale oil projects involving these companies
Directive 4	Specific defense entities	Cannot provide any goods, services, or technology

COMMON MISTAKE: THE 90-DAY ASSUMPTION

Many people in the financial industry recall that the original Russia sectoral sanctions used 90-day loan thresholds. That changed in 2017 when Congress passed CAATSA. The financial sector threshold (Directive 1) was reduced to **14 days**, and the energy sector threshold (Directive 2) was reduced to **60 days**. If your compliance training or documentation still references 90 days for Russia sectoral sanctions, it is out of date. See [FAQ #539](#).

4.3 The Crimea Embargo

Separately, [E.O. 13685](#) created a near-total embargo on the Crimea region of Ukraine. This means:

- No new investment in Crimea by U.S. persons
- No importing goods or services from Crimea
- No exporting goods or services to Crimea

In February 2022, similar restrictions were extended to the Russian-occupied Donetsk and Luhansk regions of Ukraine (under [E.O. 14065](#)).

4.4 Q&A: Common Questions About the 2014 Sanctions

Q: If a company is on the SSI List but not the SDN List, can I do business with it?

A: Mostly yes — but you need to check which Directive applies. If you're not providing the restricted transaction type (e.g., a new loan above the threshold or new equity), you can continue other types of business. However, be aware that secondary sanctions may apply if the transaction is "significant."

Q: The SSI List shows the company is subject to Directive 2 (energy). I'm providing insurance, not a loan. Is that OK?

A: Yes, Directive 2 restricts new debt and equity — not insurance. But check whether the company (or an affiliate) also has a separate SDN designation, and check whether any E.O. 14024 Determination applies to the transaction type.

Q: Does the 50% Rule apply to SSI-listed companies?

A: Yes. If an SSI-listed company owns 50% or more of another entity, that other entity is also subject to the same Directive's restrictions — even if OFAC has never specifically listed it. This is a significant compliance gap for companies that rely only on name-match screening.

KEY TAKEAWAY

The 2014 sanctions created the Sectoral Sanctions (SSI) system — a middle category between full blocking and no restriction. SSI restrictions apply only to specific transaction types, but the thresholds were tightened in 2017 and many compliance programs still use the old, higher thresholds.

5. CAATSA — Why the 2017 Law Made Russia Sanctions Harder to Remove

In August 2017, Congress passed the Countering America's Adversaries Through Sanctions Act — [CAATSA \(P.L. 115-44\)](#). For Russia specifically (Title II of the law), CAATSA made three major changes:

1. **Locked the 2014 sanctions into statute.** Before CAATSA, the 2014 Russia sanctions could be removed by the President without Congressional approval. CAATSA requires Congress to review and approve any attempt to ease or remove the Ukraine/Russia-related sanctions. The President cannot unilaterally lift them.
2. **Tightened the loan thresholds.** CAATSA reduced the permissible loan duration for Russian financial companies (Directive 1) from 90 to 14 days, and for energy companies (Directive 2) from 90 to 60 days.
3. **Created a new "secondary sanctions" weapon targeting defense deals.** Section 231 of CAATSA requires the U.S. government to impose sanctions on any person — foreign or domestic — that knowingly completes a "significant transaction" with Russia's defense or intelligence sector. This applies even if the Russian party in question is not on the SDN List.

5.1 CAATSA Section 231: The Defense Sector Prohibition

This provision has been used primarily by the State Department (not OFAC) to sanction foreign companies that buy weapons or defense equipment from Russia. But it can apply to any company.

The key elements are:

- The transaction must be "significant" — OFAC and State look at the dollar value, the nature of what is being bought, and how central it is to Russia's defense sector
- There is no list of prohibited Russian parties — the question is whether the Russian party operates in the defense or intelligence sector
- The sanction imposed is chosen from a menu: it can include denial of export licenses, prohibition on U.S. government contracts, denial of U.S. bank loans, or full blocking as an SDN

REAL-WORLD EXAMPLE: SECTION 231 IN ACTION

India's purchase of the Russian S-400 air defense system triggered Section 231 analysis. The U.S. government ultimately issued a sanctions waiver for India given its broader strategic relationship with the U.S., but the episode demonstrated that Section 231 applies even to major U.S. allies and can create diplomatic complications for defense procurement programs.

NO SAFE HARBOR, NO DOLLAR THRESHOLD

Section 231 does not define what counts as a "significant transaction," and there is no dollar amount below which you are automatically safe. Any company transacting with Russia's defense sector should seek legal advice. The State Department page on [Section 231](#) has additional guidance.

5.2 What CAATSA Section 228 Means for Banks

Section 228 of CAATSA says: if a non-U.S. financial institution does a "significant financial transaction" with a sanctioned Russian party (on the SDN List, SSI List, or NS-MBS List), the U.S. government may impose a menu of sanctions on that financial institution.

This means non-U.S. banks need to screen their Russian-related transactions not just for SDN matches, but also for SSI and NS-MBS matches — because transactions with those parties can also create secondary sanctions exposure. See [FAQ #546](#).

KEY TAKEAWAY

CAATSA means Russia sanctions are here to stay — they cannot be removed without Congressional approval. It also created secondary sanctions exposure for any company (not just U.S. companies) that does significant business with Russia's defense sector.

6. The Magnitsky Sanctions: Targeting Human Rights Abusers

The Russia-specific Magnitsky Sanctions are based on the [Sergei Magnitsky Rule of Law Accountability Act of 2012 \(P.L. 112-208\)](#). They are named after Sergei Magnitsky, a Russian tax lawyer who uncovered a massive government corruption scheme, was arrested, and died in a Russian prison in 2009 after being denied medical treatment.

These sanctions target individuals — not companies or sectors. They apply to people who were responsible for Magnitsky's detention, abuse, or death, and more broadly to Russian officials or individuals who committed serious human rights abuses against people trying to expose corruption or protect civil liberties in Russia.

MAGNITSKY vs. GLOBAL MAGNITSKY — DON'T CONFUSE THEM

Magnitsky Sanctions (this section): Russia-specific. Based on P.L. 112-208. Governed by 31 CFR Part 584. SDN tag: [MAGNIT].

Global Magnitsky Sanctions (not covered here): Applies worldwide. Based on E.O. 13818. Governed by 31 CFR Part 583. SDN tag: [GLOMAG]. Can target serious human rights abusers and corrupt officials anywhere in the world.

6.1 What the Magnitsky Sanctions Do

A Magnitsky designation works the same as any SDN designation: all of the person's property within U.S. jurisdiction is blocked, and U.S. persons cannot do business with them. The 50% Rule applies.

What makes the Magnitsky program different from the other Russia sanctions:

- It is entirely list-based — no sector restrictions, no import bans, no services prohibitions
- It has no secondary sanctions — you are not at risk simply because someone you deal with also deals with a Magnitsky-designated person (though you may be at risk under other programs)
- It targets individuals, not entities or sectors

6.2 Q&A: Common Questions About Magnitsky Sanctions

Q: If someone is designated under the Magnitsky Act, does that mean they are also on the SDN List under other Russia programs?

A: Not necessarily. A person could be designated only under the Magnitsky Act [MAGNIT] and not under E.O. 14024. However, many individuals are designated under multiple programs simultaneously — check all SDN tags.

Q: Does the Magnitsky Act only cover Russian government officials?

A: No. It covers anyone responsible for the detention/abuse of Magnitsky or who engaged in extrajudicial killings, torture, or other gross violations of internationally recognized human rights against people trying to expose corruption or exercise civil liberties in Russia.

KEY TAKEAWAY

Magnitsky sanctions block specific individuals for human rights violations and corruption related to Russia. Unlike the other three Russia programs, they impose no sector-based restrictions, no import bans, and no secondary sanctions.

7. What This Means for Your Organization

7.1 If You Are a U.S. Person or a U.S.-Based Business

Primary sanctions apply directly to you. Your obligations include:

- Before any transaction with a Russia-connected party: screen all parties against the SDN List, SSI List, and NS-MBS List
- Before importing any Russian-origin goods: check whether the goods fall under a categorical import prohibition
- Before providing services to Russia: check whether OFAC has issued a Determination banning that service category
- If any party is blocked: freeze the funds, do not complete the transaction, and report to OFAC within 10 business days
- If a transaction is rejected (not blocked): report to OFAC within 10 business days
- Maintain records of all blocked and rejected transactions

7.2 If You Are a Non-U.S. Business

Primary sanctions do not directly apply to you — but secondary sanctions can. You face risk if you:

- Conduct "significant" financial transactions with SDN-listed Russian parties (secondary sanctions under E.O. 14024 Sec. 11/12)
- Conduct "significant financial transactions" with any party on the SDN, SSI, or NS-MBS List (secondary sanctions under CAATSA Sec. 228)
- Knowingly engage in a "significant transaction" with Russia's defense or intelligence sector (secondary sanctions under CAATSA Sec. 231)

PRACTICAL TAKEAWAY FOR NON-U.S. BANKS AND BUSINESSES

If your business touches the U.S. financial system — even indirectly through dollar-denominated transactions — you should treat Russia sanctions compliance seriously. OFAC has designated foreign banks in multiple countries for their Russia-related transaction activity. The risk is real and not limited to companies with U.S. operations.

7.3 If You Are a Financial Institution

Financial institutions face all of the above, plus:

- Obligation to block (freeze) funds that are or become blocked property of a sanctioned party
- Obligation to reject (decline) transactions that would violate sanctions
- Reporting obligations for both blocked and rejected transactions
- Correspondent banking: if you maintain correspondent relationships with Russian banks on the NS-MBS List under Directive 2, you must evaluate compliance with that Directive

7.4 Everyone: A Simple Pre-Transaction Checklist

4. Search all parties (counterparties, beneficial owners, intermediaries, vessels) on the [OFAC Sanctions List Search](#)
5. Investigate ownership — if a party is owned by someone on a sanctions list, the 50% Rule may make the party itself restricted
6. For any Russian-origin goods: check the categorical import prohibitions
7. For any services to Russia: check the active Determinations under E.O. 14071
8. For defense-sector deals: consider CAATSA Section 231 exposure
9. If anything is prohibited, check applicable general licenses before doing anything else
10. If no general license covers it and it appears prohibited: do not proceed without OFAC authorization

KEY TAKEAWAY

Russia sanctions apply broadly — to U.S. persons directly, and to non-U.S. persons through secondary sanctions. The practical risk is highest for financial institutions and companies in the energy, defense, and technology sectors.

8. Official Answers to Common Questions

These are OFAC's published answers to frequently asked questions, summarized in plain language with links to the official sources.

Q: Do the 90-day loan thresholds still apply to Russian banks and energy companies?

No. As of September 29, 2017, CAATSA reduced the threshold for Russian financial companies (Directive 1) to 14 days and for energy companies (Directive 2) to 60 days. The original 90-day threshold is no longer operative. [Official answer: FAQ #539](#)

Q: Does being on OFAC's 2018 "oligarchs list" mean someone is sanctioned?

No. Being named in the Treasury Department's January 2018 report on Russian oligarchs (required by CAATSA Section 241) does not mean a person is sanctioned. The report and the SDN List are separate. Only persons specifically designated on the SDN List are sanctioned. [Official answer: FAQ #552](#)

Q: Who counts as "subject to sanctions" for the CAATSA Section 228 secondary sanctions?

Under CAATSA Section 228, a person is "subject to sanctions" if they appear on the SDN List, SSI List, or NS-MBS List pursuant to the covered authorities (including the Ukraine/Russia executive orders and CAATSA). This includes entities that are blocked or restricted by the 50% Rule even if not specifically named on a list. [Official answer: FAQ #546](#)

Q: What does Directive 4 under E.O. 14024 actually prohibit?

Directive 4 prohibits U.S. persons from engaging in any transaction involving the Central Bank of the Russian Federation, the National Wealth Fund of the Russian Federation, or the Ministry of Finance of the Russian Federation. This is a comprehensive prohibition — not limited to financial transactions. A transaction that merely passes through or involves these institutions is prohibited. [Official answer: FAQ #1118](#)

Q: What was the purpose of E.O. 13849?

E.O. 13849 (September 2018) delegated authority from the President to the Secretaries of Treasury and State, and the Director of National Intelligence, to implement the CAATSA sanction measures. Without this delegation, implementing CAATSA would have required a Presidential decision for each individual sanction. [Official answer: FAQ #627](#)

9. Where to Find Official Information

Always verify against official OFAC sources. This guide reflects OFAC publications as of May 2026 — Russia sanctions are updated frequently.

What You Need	Resource	URL
Check if a person/company is sanctioned	OFAC Sanctions List Search	sanctionssearch.ofac.treas.gov
All Russia-related programs overview	OFAC Russia Sanctions page	ofac.treasury.gov/russia-sanctions
E.O. 14024 program details, GLs, directives	Russian Harmful Foreign Activities page	ofac.treasury.gov/ruhfa
2014 Ukraine/Russia sanctions, SSI List	Ukraine-/Russia-related page	ofac.treasury.gov/ursr
CAATSA details and FAQs	CAATSA page	ofac.treasury.gov/caatsa
Magnitsky sanctions	Magnitsky page	ofac.treasury.gov/magnitsky
All OFAC FAQs	OFAC FAQs	ofac.treasury.gov/faqs
Apply for a license	OFAC License Application	ofac.treasury.gov/license-application
CAATSA Section 231 guidance	State Department	state.gov/section-231

What You Need	Resource	URL
Ukraine/Russia regulations (31 CFR Part 589)	eCFR	ecfr.gov/part-589
Russia Harmful Foreign Activities regulations (31 CFR Part 587)	eCFR	ecfr.gov/part-587
Magnitsky Act regulations (31 CFR Part 584)	eCFR	ecfr.gov/part-584